

Exhibit D

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AU NEW HAVEN, LLC, and
TRELLEBORG COATED SYSTEMS US, INC.,

Plaintiffs,

V.

YKK CORPORATION et al.,

Defendants.

CIVIL ACTION NO.
15-CV-03411-GHW

JOINT PROPOSED VOIR DIRE QUESTIONS

**Experience with the Parties, Lawyers,
Individual Voir Dire**

1. Name.
2. Where do you live?
3. Who is your current employer or your current occupation? What are your job responsibilities?
4. If you have a spouse or partner, what is that person's current employer or current occupation? What are that person's job responsibilities?
5. What is your highest level of education? If you attended college, vocational school or a graduate degree program, what was your subject area? Are you working in that field now?

Law Firms, Witnesses, and Other Jurors in This Case

1. Are you familiar with AU New Haven, LLC? If so, please explain.
2. Are you familiar with Trelleborg Coated Systems US, Inc. or anyone who works for Trelleborg Coated Systems US, Inc.? If so, please explain.
3. Are you familiar with Uretek or anyone who worked for Uretek? If so, please explain.
4. Are you familiar with YKK Corporation or anyone who works for YKK Corporation? If so, please explain.
5. Have you ever had an experience with a YKK product that you specifically recall as being either positive or negative? Please explain why your experience left you with the opinion you now have.
6. Do you know any of the lawyers or law firms in this case? [*List of all counsel of record.*] If so, please explain what you know about these lawyers or law firms.

7. You received a list of witnesses this morning [*List to be provided by the parties.*]

Do you know any of the witnesses on that list? If so, please explain what you know about these witness(es).

8. Did you know any of the members of this jury panel prior to being called to jury duty today? If so, please describe your relationship, and explain how it might affect your ability to be fair and impartial in this case.

9. Have you ever served as a juror in a lawsuit? When? What did the case(s) involve? Were you ever the foreperson?

10. Do you, or anyone close to you, have any prior knowledge of the facts of this case? If so, what is that knowledge and how did it come about? If so, will this impact your ability to be a fair and impartial juror in this case?

Experience with the Court System and Lawsuits

1. Have you, or anyone close to you, attended law school, taken any pre-law or criminology classes, or otherwise studied law?

2. Have you, or anyone close to you, ever been a plaintiff, defendant, witness, or juror in a lawsuit? If so, please describe the lawsuit, including what you recall about the dispute and its outcome, and how you felt about the experience.

3. Have you, anyone close to you, or your employer ever been involved in a business dispute that related to a patent, a trademark or a contract? If so, please describe the dispute, including what you recall about the dispute and its resolution, and how you felt about the experience.

4. Do you have strong feelings or opinions in general about our legal system?

Questions Relating to this Case

1. Have you, or anyone close to you, ever worked in the zipper, clothing/outerwear garments, luggage, marine (as in boating), or military industries? If so, please identify that person and that person's employer, and describe that person's occupation.
2. Have you, or anyone close to you, ever worked with chemical coatings or treatments, such as polyurethane? If so, please identify that person and what work that person did.
3. Have you, or anyone close to you ever worked in waterproofing of clothing or accessories. If so, please describe.
4. Do you, or anyone close to you, have any knowledge, training or experience with patents? If so, please explain.
5. Do you have any strong feelings about the patent system?
6. Have you, or anyone close to you, ever discovered or invented anything which was patented, was the subject of a patent application or was something you thought about patenting? If so, please explain.
7. Have you, or anyone close to you, ever been involved in licensing, royalty payments or in the determination of the compensation to be paid from the sale of a particular product or technology? If so, please explain. Was that product or process patented?
8. Have you, or anyone close to you, ever created something that was commercially developed or sold? If so, please explain.
9. Do you have any understanding of the Japanese language (either spoken or written), or have you studied the Japanese language or culture?

10. Do you have any strong feelings, positive or negative, about Asian companies doing business in the United States? (Any “yes” responses to be handled at sidebar.)

11. Have you had any experience drafting, negotiating or interpreting contracts or agreements? If so, please explain your experience.

12. Have you ever filed a claim or contacted a company about a product that you felt was not as advertised?

13. Do you own any outerwear or luggage that has a water resistant or water proof zipper?

Service in This Case

1. The trial in this matter is expected to last approximately two to three weeks beginning on January 13, 2020 and ending on or about January 24, 2020 through January 31, 2020. Do you have any pressing personal issue that would interfere with your ability to pay close attention to the proceedings and to serve on the jury for that length of time?

2. Do you have any personal experience or religious beliefs that you believe would prevent you from being a fair and impartial juror in this case? If so, please explain.

3. Do you have any medical conditions which might interfere with your ability to listen carefully to all of the evidence or prevent you from applying yourself fully toward a fair and impartial verdict? If so, please explain.

4. Do you have any difficulty reading movie subtitles from a TV screen or following a video presentation with subtitles?

5. Do you know of any other matter which you believe should be called to the court’s attention as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law? This is the time for you to give us any additional information we may have failed to ask about, which you

think may bear on your ability to serve as a juror and to fairly and impartially weight the evidence. If anyone is uncomfortable discussing something in front of the panel, we would be happy to have you speak with the court and the parties privately. Please raise your hand if there are any matters you wish to bring to our attention.

The parties reserve the right to ask any reasonable and appropriate follow-up questions.